



July 24, 1997

Original and 1 Copy - Via Hand Delivery

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LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD
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2 Copies - Via Overnight Mail

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Project Manager (WST-5)
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Rey Rodriguez
Utilities Division
CITY OF SANTA MONICA
1212 Fifth Street
Santa Monica, California 90401

Denise Kruger
SOUTHERN CALIFORNIA WATER
COMPANY
P.O. Box 9016
San Dimas, California 91773

**Re: Methyl Tertiary Butyl Ether Pollution Investigation of the
Charnock Sub-Basin
Response to Information Request for Assessment of Potential
Responsible Party Sites (File Number 96-042)
UNOCAL Service Station #4357, 11280 National Boulevard,
Los Angeles, California**

Dear Ms. Kruger and Messrs. Bacharowski, Linder and Rodriguez:

This letter and the accompanying attachments are being submitted in response to your request to TOSCO/76 Products Group dated June 19, 1997. The Site Specific Work Plan is being submitted along with this response under separate cover.

A. Introduction:

TOSCO just recently acquired UNOCAL Service Station #4357 on April 1, 1997, as part of TOSCO's acquisition of UNOCAL's west coast refining and marketing assets. UNOCAL assessed contamination beneath the site following a tank replacement project in 1992. The Los Angeles City Fire Department previously issued a "no further action letter" for this site on May 13, 1997. (A copy of the letter is attached as Exhibit "A".)

UNOCAL previously received a request for information from the Los Angeles Regional Board for this site, and others, and provided a response on August 14, 1996, prior to TOSCO's purchase of the site. (A copy of UNOCAL's response relative to site #4357 is attached as Exhibit "B".) Although TOSCO only recently acquired the site, and your investigation concerns issues associated with historical contamination, as current owner and operator TOSCO submits the information which follows in response to your request. You may also want to refer to UNOCAL's responses for other sites which may contain historical information applicable to this site.

The responses provided below, and the documents attached as exhibits, are based on a reasonably diligent investigation of the information and records available to TOSCO. The following information is provided without waiving any objection TOSCO may later raise concerning the admissibility of any evidence in any later proceeding. The following information is also provided without waiving TOSCO's right to later supplement TOSCO's responses with any later acquired or discovered information. The information requests contained in Appendix B of your June 19, 1997 letter are objected to by TOSCO to the extent they request information protected by the attorney-client privilege, the attorney work product doctrine and any other applicable privilege.

B. Responses to Individual Information Requests:

OWNERSHIP AND OPERATION RESPONSIBILITY FOR THE
STATION/FACILITY:

1. Ownership of the real property:

- Beginning prior to January 1, 1980 - Union Oil Company of California (UNOCAL)
- As of April 1, 1997 - Clover Trust 1997-1 (A wholly-owned subsidiary of TOSCO Corporation has a master lease with the Clover Trust for service station operations which includes site #4357.)

(Grant Deed and Corporation Grant Deed to Clover Trust are attached as Exhibit "1".)

Owner: Clover Trust
Real Estate Department
TOSCO Corporation
3003 North Central, Suite 1800
Phoenix, Arizona 85012

Lessee: Larry Fulton
29960 Bouquet Canyon Road
Saugus, California 91350

2. Ownership of the underground storage tanks and associated piping:

- Beginning prior to January 1, 1980 - Union Oil Company of California (UNOCAL)
- As of April 1, 1997 - Clover Trust 1997-1 (A wholly-owned subsidiary of TOSCO Corporation has a master lease with the Clover Trust for service station operations which includes site #4357.)

(See Corporation Grant Deed attached as Exhibit "1". Also see historical documents in Section 13.6 of Exhibit "2". Exhibit "2" contains a report entitled PHR Environmental Consultants, Inc. Phase I Environmental Site Assessment: UNOCAL Station No. 4357 11280 National Boulevard, Los Angeles, California, prepared for UNOCAL Corporation dated July 30, 1996. The document has been separately attached in Exhibit "2" for easy reference and is also a part of Exhibit "B".)

3. Parties who have operated the station:

- According to Section 13.7 of Exhibit "2", the following are the known station operators:
 - Larry L. Fulton 1969 - 1981
 - William W. Fulton 1981 - 1982
 - Larry Fulton 1982 - present

(See also the agreements attached as Exhibit "3".)

4. TOSCO objects to this request based on the grounds the term "franchise agreement" is not defined and may potentially be interpreted in different ways. Without waiving this objection, TOSCO responds as follows:

The agreements concerning operation of the station have been attached as Exhibit "3".

5. Neither the Clover Trust, nor TOSCO Corporation, have owned or operated any other station or facility as described in this request.

MTBE MANAGEMENT AND STORAGE:

6. TOSCO objects to this request based on the grounds the request potentially calls for a response which requires the disclosure of proprietary or "trade secret" information which provides TOSCO with a competitive position in the market place. Without waiving this objection, TOSCO responds as follows:

The station maintains Material Safety Data Sheets and similar documents. TOSCO also has computer generated reports which show shipments to the site. These documents are attached as Exhibit "6".

7. A fire occurred at this service station in early 1995 during construction of a car wash. Many records were destroyed in the fire. Attached as Exhibit "7" are the available records concerning storage of gasoline at the site on a daily basis.
8. According to the information available, this service station location has been supplied with gasoline from the UNOCAL, and now TOSCO, Los Angeles Terminal on Broadway and the Center Street Terminal also located in Los Angeles. These terminals are generally supplied by the former UNOCAL, now TOSCO, Los Angeles Refinery - Wilmington Plant. During times of product shortages, TOSCO understands UNOCAL supplied the Los Angeles market with products purchased from, or exchanged with, other refiners. No documents have yet been located by TOSCO which evidence this fact.
9. Gasoline inventory reconciliation occurs on a daily basis. The inventory is maintained through the use of electronic monitors and periodic tank "sticking." Other chemicals are dispensed from manufacturer provided containers. Waste materials are picked up by vendors as described in the documents attached as Exhibit "9".
10. TOSCO is not aware of any documents it has generated which would be responsive to this request, nor any documents which specifically address the potential effects of MTBE if it is discharged from this site. All of the known

reports and correspondence addressing the release of hydrocarbons have been attached as Exhibit "10".

TANKS AND ASSOCIATED PIPING RECORDS:

11. The Phase I Report for the site, attached as Exhibit "2", in Section 13.5 contains the following information:

HISTORIC TANK LOCATION SUMMARY

In 1953, the Los Angeles Fire Department issued a permit to Union Oil for the installation of two 6,000-gallon and one 280-gallon USTs. The location of these tanks is not known. A 1956 lease for the subject site listed two 10,000-gallon USTs and one 280-gallon UST. A site plan was not found depicting the location of these tanks. A site plan from 1971 shows two 10,000-gallon USTs on the northwest side of the lot, and one 550-gallon UST on the south side of the station building. In 1981, one 10,000-gallon diesel tank was installed on the north side of the existing product USTs. In 1992, all existing on-site tanks were removed, and two 12,000-gallon tanks were installed in the same approximate location as the previous product tanks, and one 550-gallon waste oil tank was installed in the same approximate location as the former waste oil tank.

12. Exhibit "2", Section 13.9, contains permits describing the tanks previously installed at the site. The 1992 tank replacement is further described in the Underground Storage Tank Closure Report attached as part of Exhibit "10". Also, some of the information requested is provided above in response to No. 11. In addition, UNOCAL provided the following information in its August 14, 1996 response for this site:

1. Construction of Site completed 12/31/71

Tanks Installed

- a. (2) 10,000 Gallon Single Wall Steel Tanks.

2. Diesel Tank Added 9/30/82

Tanks Installed

- a. (1) 10,000 Gallon Single Wall Fiberglass Tank.

3. Tank Replacement 12/1/92

Tanks Installed

- a. (2) 12,000 Gallon Modern Welding, Double Containment, Plass Steel Enviro Tanks, With API Ronan Leak Detection System.

Tanks Removed

- a. (2) 10,000 Gallon Single Wall Steel Tanks.
b. (1) 10,000 Gallon Single Wall Fiberglass Tank.

13. See December 1992 Underground Storage Tank Closure Report attached as part of Exhibit "10". Also, see Sections 13.9 and 13.4 of Exhibit "2".
14. The available records have been attached as Exhibit "14".

TESTING AND RELEASE DETECTION:

15. The available records have been attached as Exhibit "15".
16.

10/5/81	PetroTite Tank Tester	Tight
2/23/89	NDE Technology Tank Test	Tanks Certified
9/26/91	NDE Technology Tank Test	All Tanks Passed

(System Accuracy (Standard Tank): 0.05 gph-Pd>0.95/Pfa<0.05; 0.10 gph=Pd>0.99/pfa<0.01)

6/25/92	Tanknology Corporation Tank Test	System tested and found tight
10/21/93	Adams Precision Instrument Monitoring Certification (A.P.I./Ronan Leak Detection System Certification)	

10/6/94	Adams Precision Instrument Monitoring Certification (A.P.I./Ronan Leak Detection System Certification)	
10/23/95	NDE Environmental Monitoring System Certification	Pass
10/3/96	Triangle Environmental, Inc. Monitor Certification Inspection	Certified

Copies of each test listed above are included in Exhibit "15".

17. The leak detection system for the present underground storage tanks and piping is described as follows:

The tanks are monitored for leaks by a Ronan X76LVCS electronic monitoring system. This system monitors the interstitial space between the two gasoline tanks and waste oil tank for the presence of liquids. If a liquid is detected by the sensor, the monitor goes into an alarm condition.

The product piping is monitored for leaks with the same Ronan electronic monitoring system which contains liquid sensors in the turbine sumps on top of each gasoline tank. The double walled product piping is sloped back to the turbine sumps, so if a leak occurs, the product will drain to the turbine sump where it will be detected by the liquid sensor. The monitor will go into an alarm condition, and the power to the turbines will be shut off.

The product piping is also equipped with mechanical leak detectors as a secondary check to the electronic system.

18. In addition to the reports attached as Exhibit "10", Exhibit "18" contains a UNOCAL "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report."

19.

INVESTIGATION AND REMEDIATION RECORDS:

- 12/92 UNOCAL Refining and Marketing Division Closure Report
Underground Storage Tank
UNOCAL Service Station #4357
11280 National Boulevard
Los Angeles, California
by James M. Montgomery
- 4/93 UNOCAL Refining and Marketing Division
Phase II
Subsurface Investigation Report for Station #4357
by Montgomery Watson
- 10/25/93 Vapor Extraction Feasibility Test Report
UNOCAL Service Station #4357
11280 National Boulevard
Los Angeles, California
by Vapor Extraction Technology, Inc.
- 6/94 UNOCAL Corporate Environmental Remediation and
Technology
Feasibility Study for Service Station #4357
by Montgomery Watson
- 6/94 UNOCAL Corporate Environmental Remediation and
Technology
Remedial Action Plan for Service Station #4357
by Montgomery Watson
- 9/16/96 Formal Site Closure Request
UNOCAL Service Station #4357
11280 National Boulevard
Los Angeles, California
by Alton Geoscience

Each of these reports, plus agency correspondence, are included in Exhibit "10".

20. The completed form is attached as Exhibit "20".

Response to Information Request

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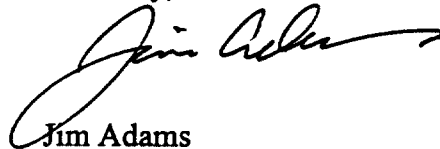
21. The documents requested have been attached as Exhibit "10".
22. All of the documents related to subsurface investigations have been attached as Exhibit "10".
23. Copies of the requested documents are attached as Exhibit "23".

FACILITY MAP:

24. The requested documents are contained in Exhibit "2", Sections 13.1, 13.2 and 13.4, and Exhibit "B".

Please feel free to contact me at (714)428-6488, or TOSCO's legal representative Jeff Dill at (562)906-7552, if you have any questions or comments concerning TOSCO's responses.

Sincerely,



Jim Adams

JA:lms

Enclosures

cc: Richard Williams - UNOCAL (w/ enclosures)
Jeffrey Dill, Esq. (w/enclosures)